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7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
8	UNITED STATES OF AMERICA,	Case No. 2:22-mj-00561-NJK
9	Plaintiff,	Stipulation for an Order
10	v.	Directing Probation to Prepare a Criminal History Report
11	JOSE ALFREDO PELLEGRIN-MEDINA,	
12	aka "Jose Alfredo Pellegrin," aka "Jose Medina,"	
13	·	
	Defendant.	
14		
15	IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.	
16	Frierson, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney,	
17	counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and	
18	Stacy Newman, Assistant Federal Public Defender, counsel for Defendant JOSE	
19	ALFREDO PELLEGRIN-MEDINA, that the Court direct the U.S. Probation Office to	
20	prepare a report detailing the defendant's criminal history.	
21	This stipulation is entered into for the following reasons:	
22	1. The United States Attorney's Office has developed an early disposition	
23	program for immigration cases, authorized by the Attorney General pursuant to the	
24	PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has	

1	extended to the defendant a plea offer in which the parties would agree to jointly request as	
2	expedited sentencing immediately after the defendant enters a guilty plea.	
3	2. The U.S. Probation Office cannot begin obtaining the defendant's criminal	
4	history until after the defendant enters his guilty plea unless the Court enters an order	
5	directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of	
6	a defendant's initial appearance when charged by indictment.	
7	3. The U.S. Probation Office informs the government that it would like to begin	
8	obtaining the criminal history of defendants eligible for the early disposition program as	
9	soon as possible after their initial appearance so that the Probation Office can complete the	
10	Presentence Investigation Report by the time of the expected expedited sentencing.	
11	4. Accordingly, the parties request that the Court enter an order directing the	
12	U.S. Probation Office to prepare a report detailing the defendant's criminal history.	
13	DATED this 25th day of July, 2022.	
14		Respectfully Submitted,
15	RENE L. VALLADARES Federal Public Defender	JASON M. FRIERSON United States Attorney
16		Officed States Attorney
17	/s/ Stacy M. Newman	/s/ Jared L. Grimmer
18	Assistant Federal Public Defender Counsel for Defendant JOSE ALFREDO PELLEGRIN-MEDINA	JARED L. GRIMMER Assistant United States Attorney
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1 UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA** 2 UNITED STATES OF AMERICA, Case No. 2:22-mj-00561-NJK 3 Plaintiff, **Order Directing Probation to** 4 Prepare a Criminal History Report 5 v. JOSE ALFREDO PELLEGRIN-MEDINA, 6 aka "Jose Alfredo Pellegrin," 7 aka "Jose Medina," 8 Defendant. 9 Based on the stipulation of counsel, good cause appearing, and the best interest of 10 justice being served: 11 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a 12 report detailing the defendant's criminal history. 13 DATED: August 1, 2022. 14 15 16 HONORABLE NANCY J. KOPPE UNITED STATES MAGISTRATE JUDGE 17 18 19 20 21 22 23 24